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8 *Wynn Las Vegas, LLC and Wynn Resorts, Ltd.*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 BRENNA SCHRADER, an individual, on
12 behalf of herself and all others similarly
situated,

13 Plaintiff,

14 vs.

15 STEPHEN ALAN WYNN; an individual;
MAURICE WOODEN, an individual, WYNN
16 LAS VEGAS, LLC dba WYNN LAS VEGAS
a Nevada Limited Liability, WYNN
17 RESORTS, LTD, a Nevada Limited Liability
Company; and DOES 1-20, inclusive; ROE
18 CORPORATIONS 1-20, inclusive,

19 Defendants.

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION TO EXTEND TIME
FOR THE PARTIES TO FILE THE
DISCOVERY PLAN AND
SCHEDULING ORDER**

(Third Request)

20 IT IS HEREBY STIPULATED by and between Plaintiff Brenna Schrader ("Plaintiff"),
21 through her counsel Richard Harris Law Firm and Eglet Adams, Defendants Wynn Las Vegas, LLC
22 ("WLV") and Wynn Resorts, Ltd. ("WRL"), through their counsel Jackson Lewis P.C., and
23 Defendant Stephen Alan Wynn ("Mr. Wynn"), through his counsel Peterson Baker, PLLC, that the
24 time for the Parties to submit the Discovery Plan and Scheduling Order shall be extended to and
25 including **May 20, 2022**.

26 This Stipulation is submitted and based upon the following:

27 1. On May 11, 2020, the Court entered an Order granting Defendants' Motion for Stay
28 of Discovery. ECF No. 57.

1 2. On February 17, 2021, the Court entered an Order that, among other things, granted,
2 in part, Plaintiff's Motion for Leave to File her First Amended Complaint with respect to certain
3 claims. ECF No. 89. Pursuant to the Court's Order, the Clerk's Office filed Plaintiff's First
4 Amended Complaint on February 17, 2021. ECF No. 90.

5 3. On March 2, 2021, the Parties stipulated to extend the time for all Defendants to
6 respond to the First Amended Complaint from March 3, 2021, to March 17, 2021. ECF No. 91. The
7 Court entered an order approving the Stipulation on March 9, 2021. ECF No. 92.

8 4. On March 11, 2021, the Parties stipulated to extend the time for all Defendants to
9 respond to the First Amended Complaint from March 17, 2021, to March 31, 2021. ECF No. 93.
10 The Court entered an order approving the Stipulation on March 15, 2021. ECF No. 95.

11 5. On March 31, 2021, Defendant Mr. Wynn filed his motion to dismiss Plaintiff's
12 First Amended Complaint. ECF No. 99. Defendant Mr. Wynn also moved on April 7, 2021, to stay
13 discovery pending the Court's decision on the pending motions to dismiss. ECF No. 101.

14 6. On April 7, 2021, Defendants WRL and WLV filed their motion to dismiss the First
15 Amended Complaint. ECF Nos. 103. Defendants WRL and WLV also filed their respective
16 Answers to Plaintiff's First Amended Complaint that same day. ECF No. 104 and 105. Defendants
17 WRL and WLV filed a motion to stay discovery pending decision on the motions to dismiss. ECF
18 No. 106.

19 7. On October 14, 2021, the Court entered an Order granting Defendants' respective
20 motions to stay discovery. ECF No. 139. Therein, the Court ordered "that the parties are to file a
21 joint, proposed discovery plan and scheduling order within 14 days after ECF Nos. 98, 99, and 103
22 are decided." *Id.* at p. 9.

23 8. On March 31, 2022, the Court entered an order granting, in part, and denying, in
24 part, Defendants' respective motions to dismiss. ECF No. 140. Defendant Wooden has been
25 dismissed from the case entirely. *Id.*

26 9. On April 11, 2022, the Court entered an order granting the parties' stipulation to
27 extend the time for the parties to file the proposed scheduling order (first request) to April 28, 2022.
28 ECF No. 142.

1 10. On April 27, 2022, the Court entered an order granting the parties' stipulation to
2 extend the time for the parties to file the proposed scheduling order (second request) to May 13,
3 2022. ECF No. 146. The extension was necessary because Plaintiff's counsel was in trial in another
4 case for several weeks.

5 11. On May 9, 2022, Plaintiff associated in additional attorneys of record from the law
6 firm of Eglet Adams.

7 12. On May 10, 2022, the parties held the FRCP 26(f) conference. Thereafter, they
8 exchanged drafts of the Joint Discovery Plan and Scheduling Order. However, after reviewing the
9 latest draft (circulated the morning of May 10th), the parties believe they need to conduct a second
10 26(f) conference to attempt to resolve areas of significant disagreement that have since arisen and
11 were not apparent during the first conference. However, not all counsel are available to hold a
12 second conference and make any necessary revisions to the Joint Discovery Plan and Scheduling
13 Order until next week. As a result, the parties need additional time to meet and confer in order to
14 finalize the proposed discovery plan and scheduling order.

15 13. Based on the foregoing considerations, the Parties have agreed to extend the
16 deadline to submit the proposed discovery plan and scheduling order to and including **May 20,**
17 **2022.**

18 14. This Stipulation is made in good faith and not for the purpose of delay.

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